

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

PC CONNECTION, INC. d/b/a )  
CONNECTION )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
INTERNATIONAL BUSINESS )  
MACHINES CORPORATION, )  
 )  
Defendant. )  
 )

**Civil Action No. 1:22-CV-00397-SE-AJ**

**PLAINTIFF’S ASSENTED-TO MOTION TO EXTEND ITS  
DEADLINE TO PRODUCE DOCUMENTS**

Pursuant to Local Rule 7.2, Plaintiff PC Connection, Inc. d/b/a Connection (“Connection”) respectfully moves, with Defendant’s *assent*, to extend its deadline by two weeks (to July 10) to produce documents in accordance with the Court’s June 5, 2024 order denying Defendant International Business Machines Corporation’s (“IBM”) Motion to Compel without prejudice. As grounds for this Motion, Plaintiff states as follows:

1. On June 5, 2024, the Court held a discovery conference to address several outstanding motions filed by the parties.
2. One such motion was IBM’s Motion to Compel (Dkt. No. 75) seeking an order compelling Connection to produce documents in response to certain of IBM’s document requests.
3. After hearing arguments from counsel, the Court denied IBM’s Motion without prejudice the following day, stating in an endorsed order that the denial was “based on the plaintiff’s representation that it will provide within 21 days responsive documents, redacted if

appropriate, from those maintained and segregated by the board secretary.” Pursuant to that order, Connection’s deadline to produce documents is currently June 26, 2024.

4. Connection is in the process of compiling and reviewing documents for responsiveness in accordance with the Court’s order; however, it requires more time to do so before being able to produce responsive documents (including, where necessary, in appropriately redacted form).

5. On June 26, 2024, Connection requested IBM’s assent to a two-week extension of time to produce the responsive documents at issue. That same day, IBM, through counsel, *assented* to the relief requested by Connection.

6. Pursuant to Local Rule 7.2(a), Connection states that the brief extension until July 10, 2024 will not result in the continuance of any hearing, conference or trial. The parties are in the middle of discovery, have no imminent upcoming deadlines under this case’s operative discovery plan, and the close of fact discovery deadline is not for several months.

7. No memorandum of law in support of this motion is necessary as the relief requested is within the sound discretion of the Court.

WHEREFORE, Connection respectfully requests that this Honorable Court:

- A. Grant this Motion;
- B. Extend Plaintiff’s deadline to produce documents in accordance with the Court’s June 5, 2024 order to July 10, 2024; and
- C. Grant such other relief as is deemed just and equitable.

Respectfully submitted,

PC CONNECTION, INC.,  
d/b/a CONNECTION

By its attorneys,

Dated: June 26, 2024

/s/ Daniel M. Deschenes  
Christopher H.M. Carter (#12452)  
Daniel M. Deschenes (#14889)  
John A. LeBlanc (admitted *pro hac vice*)  
Hinckley, Allen & Snyder LLP  
650 Elm Street, Suite 500  
Manchester, NH 03101  
Telephone: (603) 225-4334  
ccarter@hinckleyallen.com  
ddeschenes@hinckleyallen.com  
jleblanc@hinckleyallen.com

Christine K. Bush (admitted *pro hac vice*)  
Hinckley Allen & Snyder, LLP  
100 Westminster Street, Suite 1500  
Providence, RI 02903  
Telephone:(401) 274-2000  
cbush@hinckleyallen.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the above date a copy of the foregoing has been forwarded to all counsel of record via the Court's electronic filing system via the Court's electronic filing system.

/s/ Daniel M. Deschenes  
Daniel M. Deschenes